



Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes
Automotive Care - Antimicrobial - Pest Management

January 24, 2014

The Honorable Steven Bieda
State Senator
310 Farnum Building
P.O. Box 30036
Lansing, MI 48909

RE: SB 29 – Addition of Bittering Agent to Engine Coolant - SUPPORT

Dear Senator Bieda:

On behalf of the Consumer Specialty Products Association, I am pleased to support Senate Bill 29, which requires the addition of a bittering agent to engine coolant. The bill has been referred to the House Committee on Regulatory Reform.

The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$100 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care[®], and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety and sustainability of their products.

CSPA supports legislation requiring antifreeze and engine coolant to contain a bittering agent so as to render it unpalatable to animals and humans. To date, more than 15 states have enacted such laws to help prevent the accidental or intentional poisoning of people, pets and other animals as a result of ingesting antifreeze or engine coolant and in December 2012, manufacturers voluntarily agreed to add a bittering agent to antifreeze.

SB 29 requires certain engine coolants sold in Michigan after January 1, 2015 to include a certain amount of the bittering agent denatonium benzoate. SB 29 also includes necessary liability limitation for manufacturers of antifreeze that are not producers of the bittering agent.

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and yet would be required to include it in their products under the provisions of this measure. SB 29 apportions liability to both manufacturers of engine coolants and manufacturers of denatonium benzoate. The manufacturer of the bittering agent is responsible if liability arises from the inclusion of the bittering agent. If a liability arises from the engine coolant and is unrelated to the inclusion of the bittering agent, the manufacturer of the engine coolant would remain liable. It is a matter of fundamental fairness and equity that this legislation provides limitation of liability for the manufacturers of engine coolant and stipulates that the bittering agent manufacturers maintain liability for their product.

CSPA supports the measure as drafted and respectfully requests the support of your colleagues for SB 29. Please contact me at (202) 833-7308 or ocaine@cspa.org if you have questions or would like additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Owen Caine", with a long, sweeping horizontal line extending to the right.

Owen Caine
Manager, State Affairs

cc: CSPA State Government Affairs Advisory Committee